

NECHELES CASSIDY LLP

ATTORNEYS AT LAW

10 EAST 40TH STREET, 48TH FLOOR

NEW YORK, N.Y. 10016

TELEPHONE: (212) 997-7400

TELECOPIER: (212) 997-7646

October 16, 2020

Via ECF

Hon. Nelson S. Roman

United States District Judge

Southern District of New York

300 Quarropas St.

White Plains, NY 10601

Re: *United States v. Yosef Ziegler*, 19-cr-916

Dear Judge Roman:

We respectfully write to request a three-week adjournment of the motion schedule in this case.

We have recently begun renewed discussions with the U.S. Attorney's Office about the possibility of resolving this case via plea instead of proceeding with motion practice. We believe the requested adjournment will provide sufficient time to continue these discussions and for Mr. Ziegler to decide how he wants to proceed. We therefore respectfully request a three-week adjournment of the briefing scheduled. The current schedule is:

Defense Motions Due: October 19;

Government Response Due: November 20;

Defense Reply Due: November 30.

The new proposed deadlines would be:

Defense Motions Due: November 9;

Government Response Due: December 11;

Defense Reply Due: December 21.

I have spoken to AUSA Courtney Heavey and she has no objection to this request.

Respectfully submitted,

/s/

Susan R. Necheles

Gedalia Stern

cc: AUSA Courtney Heavey